



31 Flagg Dr.
Framingham, MA 01702
508-875-5434

August 7, 2013

Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *In the Matter of Accessibility of User Interfaces, and Video Programming
Guides and Menus, MB Docket No. 12-108, Notice of Proposed Rulemaking
(FCC 13-77)*

Dear Commissioners:

Framingham Public Access Corporation, dba Access Framingham, submits this letter in the above-referenced rulemaking proceeding (NPRM) in support of the comments filed by the Alliance for Community Media; the Alliance for Communications Democracy; Montgomery County, Maryland; and the National Association of Counties, National Association of Telecommunications Officers and Advisors & U.S. Conference of Mayors.

Access Framingham is a 501(c)(3) nonprofit organization providing public access programming and training in the Town of Framingham, Massachusetts. We provide more than 400 hours per year of first-run locally produced programming, in addition to approximately 400 hours of national/regional original programming requested by members of our community, programming not available on other local outlets. We carry programming seven days per week, 17 hours per day. This programming includes local news, political debates and discussions, youth sports, community arts and performances, religious programs, children's shows, veterans' programs, and health programs. During overnight and weekday afternoon hours, we carry the Talking Information Center Reading Service for the visually impaired, including specific scheduled programming for that community. Our programming is available on Comcast, RCN and Verizon to approximately 20,000 cable subscribers in the Town of Framingham, plus additional households in nearby communities on Verizon FIOS.

We carry more than sixty series programs on our channel. One such daily series, Democracy Now!, a nationally-focused morning newscast, is available to us with closed captioning, and we are working to bring in additional programming with closed captioning.

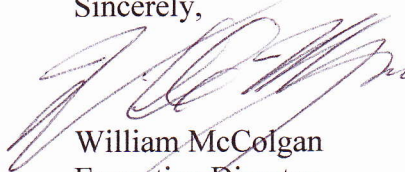
We have program descriptions and accessibility information readily available for our programs with accessibility options such as closed captions. However, Comcast lists only "Local 2" broken into 24-hour increments, RCN lists only "Public Access Programming" broken into 24-hour increments, and Verizon lists only "Local Programming" broken into 4-hour increments, in their onscreen guides. This level of information is inadequate to meet the accessibility goals of

the Twenty-First Century Communications and Video Accessibility Act of 2010 (CVAA). In early 2012, we approached representatives of each of the three MVPDs about including our listings in their Electronic Program Guides. Comcast said they might possibly be able to provide it 18 months from that time, which has passed with no further word. RCN did not reply to our inquiry. Verizon refused to consider it. Viewers cannot determine from the MVPD's video programming guide what our programs are and whether our programs are accessible. Thus, viewers with visual or auditory disabilities cannot make meaningful video program choices.

We urge the Commission to adopt rules that would require video programming guides and menus which display channel and program information to include, for all channels, high level channel and program descriptions and titles, as well as a symbol identifying the programs with accessibility options (captioning and video description).

Thank you for the opportunity to submit these comments.

Sincerely,



William McColgan
Executive Director